

EXHIBIT A



Notice of Service of Process

null / ALL
Transmittal Number: 23660341
Date Processed: 08/20/2021

Primary Contact: Steven Ughy
UGI Corporation
460 N Gulph Rd
King of Prussia, PA 19406-2815

Electronic copy provided to: Mary Banks

Entity: AmeriGas Propane GP, LLC
Entity ID Number 3988122

Entity Served: Amerigas Propane, Gp, LLC

Title of Action: Rico Khan, vs. Amerigas Propane, Gp, LLC

Document(s) Type: Summons/Complaint

Nature of Action: Personal Injury

Court/Agency: Cook County Circuit Court, IL

Case/Reference No: 2021L007259

Jurisdiction Served: Illinois

Date Served on CSC: 08/19/2021

Answer or Appearance Due: 30 Days

Originally Served On: CSC

How Served: Personal Service

Sender Information: The Kryder Law Group, LLC
312-223-1700

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FILED DATE: 8/16/2021 10:38 AM 2021L007259

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2621 - Alias Sec of State

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2321 - Served By Mail

2420 - Served By Publication 2421 - Served By Publication

Summons - Alias Summons

(03/15/21) CCG 0001 A

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Name all Parties

RICO KHAN

Plaintiff(s)

v.

AMERIGAS PROPANE, GP, LLC, et al.

Defendant(s)

Case No. 2021 L 007259

Address of Defendant(s)

Please serve as follows (check one): ☐ Certified Mail ☐ Sheriff Service ☒ Alias

SUMMONS

To each Defendant:

You have been named a defendant in the complaint in this case, a copy of which is hereto attached. You are summoned and required to file your appearance, in the office of the clerk of this court, within 30 days after service of this summons, not counting the day of service. If you fail to do so, a judgment by default may be entered against you for the relief asked in the complaint.

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Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois

cookcountyclerkofcourt.org

Page 1 of 3

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Summons - Alias Summons

(03/15/21) CCG 0001 B

E-FILING: E-filing is now mandatory with limited exemptions. To e-File, you must first create an account with an e-Filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider.

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COURT DATE: Your court date will be sent to your e-File email account or the email address you provided to the clerk's office. You can also call or email the clerk's office to request your next court date. You will need to provide your case number OR, if unknown, the name of the Plaintiff or Defendant. For criminal case types, you will also need to provide the Defendant's birthdate.

REMOTE APPEARANCE: You may be able to attend this court date by phone or video conference.

This is called a "Remote Appearance". Call the Circuit Clerk at (312) 603-5030 or visit their website at www.cookcountyclerkofcourt.org to find out how to do this.

Contact information for each of the Clerk's Office locations is included with this summons. The Clerk's office is open Mon - Fri, 8:30 am - 4:30 pm, except for court holidays.

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8/16/2021 10:38 AM IRIS Y. MARTINEZ

☒ Atty. No.: 38274
☐ Pro Se 99500

Witness date _____

Name: The Kryder Law Group, LLC.

Atty. for (if applicable):
 Plaintiff

Iris Y. Martinez, Clerk of Court

☐ Service by Certified Mail: _____

Address: 134 North LaSalle, Suite 1515

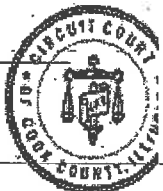
☐ Date of Service: _____
 (To be inserted by officer on copy left with employer or other person)

City: Chicago

State: IL Zip: 60602

Telephone: (312) 223-1700

Primary Email: Info@Kryderlaw.com



Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois

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Notice of Service of Process

null / ALL
Transmittal Number: 23663308
Date Processed: 08/20/2021

Primary Contact: Steven Ughy
UGI Corporation
460 N Gulph Rd
King of Prussia, PA 19406-2815

Electronic copy provided to: Mary Banks

Entity: AmeriGas Eagle Holdings, Inc.
Entity ID Number 2082279

Entity Served: Amerigas Eagle Holdings, Inc.

Title of Action: Rico Khan vs. Amerigas Propane Gp, LLC

Document(s) Type: Summons/Complaint

Nature of Action: Personal Injury

Court/Agency: Cook County Circuit Court, IL

Case/Reference No: 2021L007259

Jurisdiction Served: Illinois

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Name all Parties

RICO KHAN

Plaintiff(s)

v.

AMERIGAS PROPANE, GP, LLC., et al.

Case No. 2021 L 007259

Defendant(s)

Amerigas Eagle Holdings, Inc.

Address of Defendant(s)

Please serve as follows (check one): ☐ Certified Mail ☐ Sheriff Service ☒ Alias

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8/16/2021 10:38 AM IRIS Y. MARTINEZ

☉ Atty. No.: 38274
○ Pro Se 99500

Witness date _____

Name: The Kryder Law Group, LLC...

Atty. for (if applicable):

Iris Y. Martinez, Clerk of Court

Plaintiff

☐ Service by Certified Mail: _____

Address: 134 North LaSalle, Suite 1515

☐ Date of Service: _____
(To be inserted by officer on copy left with employer or other person)

City: Chicago

State: IL Zip: 60602

Telephone: (312) 223-1700

Primary Email: Info@Kryderlaw.com



Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois
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Notice of Service of Process

Transmittal Number: 23663318
Date Processed: 08/20/2021

Primary Contact: Steven Ughy
UGI Corporation
460 N Gulph Rd
King of Prussia, PA 19406-2815

Electronic copy provided to: Mary Banks

Entity:	Amerigas Propane Parts & Service, Inc. Entity ID Number 1662538
Entity Served:	Amerigas Propane Parts & Service, Inc.
Title of Action:	Rico Khan vs. Amerigas Propane Gp, LLC
Document(s) Type:	Summons/Complaint
Nature of Action:	Personal Injury
Court/Agency:	Cook County Circuit Court, IL
Case/Reference No:	2021L007259
Jurisdiction Served:	Illinois
Date Served on CSC:	08/19/2021
Answer or Appearance Due:	30 Days
Originally Served On:	CSC
How Served:	Personal Service
Sender Information:	The Kryder Law Group, LLC 312-223-1700

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IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

Name all Parties

RICO KHAN

Plaintiff(s)

v.

AMERIGAS PROPANE, GP, LLC., et al.

Case No. 2021 L 007259

Amerigas Propane Parts & Service, Inc. Defendant(s)

Address of Defendant(s)

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☒ Atty. No.: 38274
☐ Pro Se 99500

Witness date _____

Name: The Kryder Law Group, LLC.

Atty. for (if applicable):

Iris Y. Martinez, Clerk of Court

Plaintiff

☐ Service by Certified Mail: _____

Address: 134 North LaSalle, Suite 1515

☐ Date of Service: _____
 (To be inserted by officer on copy left with employer or other person)

City: Chicago

State: IL Zip: 60602

Telephone: (312) 223-1700

Primary Email: Info@Kryderlaw.com



Iris Y. Martinez, Clerk of the Circuit Court of Cook County, Illinois
cookcountyclerkofcourt.org

FILED
7/19/2021 12:00 AM
IRIS Y. MARTINEZ
CIRCUIT CLERK
COOK COUNTY, IL
14080012

STATE OF ILLINOIS)
)SS.
COUNTY OF COOK)

IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS
COUNTY DEPARTMENT, LAW DIVISION

RICO KHAN,

Plaintiff,

v.

Case No.: 2021L007259

AMERIGAS PROPANE GP, LLC;
AMERIGAS EAGLE HOLDINGS, INC.;
AMERIGAS PROPANE PARTS &
SERVICE, INC.;

Defendants.

COMPLAINT

NOW COMES the Plaintiff, RICO KHAN, by and through his attorneys, THE KRYDER LAW GROUP, LLC., and complains of the Defendants, AMERIGAS PROPANE GP, LLC; AMERIGAS EAGLE HOLDINGS, INC.; and AMERIGAS PROPANE PARTS & SERVICE, INC., and in support thereof states as follows:

1. On or about November 4, 2019, Defendant, AMERIGAS PROPANE GP, LLC, was a corporation licensed to do business in the State of Illinois and was in the commercial propane industry.

2. On or about November 4, 2019, Defendant, AMERIGAS EAGLE HOLDINGS, INC., was a corporation licensed to do business in the State of Illinois and was in the commercial propane industry.

3. On or about November 4, 2019, Defendant, AMERIGAS PROPANE PARTS & SERVICE, INC., was a corporation licensed to do business in the State of

AUG 19 2021

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Illinois and was in the commercial propane industry.

4. On November 4, 2019, Power Solutions International, Inc., was an Illinois Corporation doing business in the State of Illinois and was in the business of providing engines and power systems to vendors within the State of Illinois.

5. On November 4, 2019, Power Solutions International, Inc., owned, operated, and maintained the premises located at 201 Mittel Drive in Wood Dale, Illinois, which housed a large industrial factory.

6. On November 4, 2019, Defendant, AMERIGAS PROPANE GP, LLC, by and through its employees/ agents, contracted with Power Solutions International, Inc., to manufacture, deliver, and maintain propane tanks.

7. On November 4, 2019, Defendant, AMERIGAS EAGLE HOLDINGS, INC., by and through its employees/ agents, contracted with Power Solutions International, Inc., to manufacture, deliver, and maintain propane tanks.

8. On November 4, 2019, Defendant, AMERIGAS PROPANE PARTS & SERVICE, INC., by and through its employees/ agents, contracted with Power Solutions International, Inc., to manufacture, deliver, and maintain propane tanks.

9. On November 4, 2019, the aforementioned Power Solutions International, Inc., premises consisted of a large industrial building that housed a metal cage where propane tanks were stored.

10. On November 4, 2019, Defendant, AMERIGAS PROPANE GP, LLC, was responsible for the manufacture, delivery, maintenance, and upkeep of the propane tanks that were delivered to Power Solutions International, Inc.

11. On November 4, 2019, Defendant, AMERIGAS EAGLE HOLDINGS, INC.,

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was responsible for the manufacture, delivery, maintenance, and upkeep of the propane tanks that were delivered to Power Solutions International, Inc.

12. On November 4, 2019, Defendant, AMERIGAS PROPANE PARTS & SERVICE, INC., was responsible for the manufacture, delivery, maintenance, and upkeep of the propane tanks that were delivered to Power Solutions International, Inc.

13. On November 4, 2019, and at all times material, the Plaintiff, RICO KHAN, was employed with Power Solutions International, Inc., as a product tester.

14. On November 4, 2019, Plaintiff, RICO KHAN, was lifting a propane tank from its designated, caged area when the tank malfunctioned due to a missing and/or damaged O-ring and released propane directly onto his hands.

15. On November 4, 2019, and at all times material, Defendant, AMERIGAS PROPANE GP, LLC, by and through its agents, servants, and/or employees, had the duty to exercise ordinary care in the manufacturing, delivery, maintenance, and upkeep of its propane tanks.

16. On November 4, 2019, and at all times material, Defendant, AMERIGAS EAGLE HOLDINGS, INC., by and through its agents, servants, and/or employees, had the duty to exercise ordinary care in the manufacturing, delivery, maintenance, and upkeep of its propane tanks.

17. On November 4, 2019, and at all times material, Defendant, AMERIGAS PROPANE PARTS & SERVICE, INC., by and through its agents, servants, and/or employees, had the duty to exercise ordinary care in the manufacturing, delivery, maintenance, and upkeep of its propane tanks.

18. At all times material, Plaintiff, RICO KHAN, was free of fault and contributory

negligence.

COUNT I – RICO KHAN v. AMERIGAS PROPANE GP, LLC.

19. Plaintiff realleges and incorporates paragraphs 1-18 as though fully restated herein.

20. At the time and place aforesaid, Defendant, AMERIGAS PROPANE GP, LLC., by and through its agents and/or employees, then and there breached the aforementioned duty through one or more of the following acts and/or omissions:

- a. Carelessly and negligently, manufactured a malfunctioning, defective and/or hazardous propane tank despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- b. Carelessly and negligently delivered a malfunctioning, defective and/or hazardous propane tank despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- c. Carelessly and negligently, maintained a malfunctioning, defective and/or hazardous propane tank despite knowing, or through reasonable inquiry knowing, of the danger it posed to those handling the tanks;
- d. Carelessly and negligently, manufactured a propane tank that had a missing and/or damaged O-ring despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- e. Carelessly and negligently, delivered a propane tank that had a missing and/or damaged O-ring despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- f. Carelessly and negligently maintained a propane tank that had a missing

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and/or damaged O-ring despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;

g. Carelessly and negligently, failed to inspect its propane tanks for malfunctioning, defective and/or hazardous conditions, including a missing and/or damaged O-ring, prior to delivering the tank despite knowing, or through reasonable inquiry, knowing of the danger it posed those handling the tanks;

h. Carelessly and negligently, failed to routinely inspect the propane tanks it delivered to its customers, including Power Solutions International, Inc., for malfunctioning, defective and/or hazardous conditions, including a missing and/or damaged O-ring, despite knowing, or through reasonable inquiry, knowing of the danger it posed those handling the tanks;

i. Carelessly and negligently failed to train its employees in inspecting propane tanks for malfunctioning, defective and/or hazardous conditions, including missing and/or damaged O-rings, prior to delivery; and

j. Carelessly and negligently failed to train its employees to routinely inspect the propane tanks for malfunctioning, defective and/or hazardous conditions, including missing and/or damaged O-ring, prior to delivery.

21. As a direct and proximate result of one or more of the aforesaid careless and negligent acts and/or omissions of the Defendant, AMERIGAS PROPANE GP, LLC., the Plaintiff, RICO KHAN, then and there sustained severe and permanent bodily injury and was, and will be, hindered and prevented from attending to his usual duties and affairs of life, and has lost, and will continue to lose, the value of that time as aforementioned. Further, Plaintiff, RICO KHAN, suffered

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great pain and anguish, both in mind and body, and will in the future continue to suffer. The Plaintiff, RICO KHAN, further expended and became liable for large sums of money for medical care and services and will in the future expend money for medical care and services endeavoring to become healed and cured of said injuries.

WHEREFORE, the Plaintiff, RICO KHAN, demands judgment against the Defendant, AMERIGAS PROPANE GP, LLC., in a sum greater than \$50,000.00 (Fifty Thousand Dollars) plus costs of this case and any additional relief this Court deems fair and just.

COUNT II – RICO KHAN v. AMERIGAS EAGLE HOLDINGS, INC.

22. Plaintiff realleges and incorporates paragraphs 1-18 as though fully restated herein.

23. At the time and place aforesaid, Defendant, AMERIGAS EAGLE HOLDINGS, INC., by and through its agents and/or employees, then and there breached the aforementioned duty through one or more of the following acts and/or omissions:

- a. Carelessly and negligently, manufactured a malfunctioning, defective and/or hazardous propane tank despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- b. Carelessly and negligently delivered a malfunctioning, defective and/or hazardous propane tank despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- c. Carelessly and negligently, maintained a malfunctioning, defective and/or hazardous propane tank despite knowing, or through reasonable inquiry knowing, of the danger it posed to those handling the tanks;

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- d. Carelessly and negligently, manufactured a propane tank that had a missing and/or damaged O-ring despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- e. Carelessly and negligently, delivered a propane tank that had a missing and/or damaged O-ring despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- f. Carelessly and negligently maintained a propane tank that had a missing and/or damaged O-ring despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- g. Carelessly and negligently, failed to inspect its propane tanks for malfunctioning, defective and/or hazardous conditions, including a missing and/or damaged O-ring, prior to delivering the tank despite knowing, or through reasonable inquiry, knowing of the danger it posed those handling the tanks;
- h. Carelessly and negligently, failed to routinely inspect the propane tanks it delivered to its customers, including Power Solutions International, Inc., for malfunctioning, defective and/or hazardous conditions, including a missing and/or damaged O-ring, despite knowing, or through reasonable inquiry, knowing of the danger it posed those handling the tanks;
- i. Carelessly and negligently failed to train its employees in inspecting propane tanks for malfunctioning, defective and/or hazardous conditions, including missing and/or damaged O-rings, prior to delivery; and
- j. Carelessly and negligently failed to train its employees to routinely inspect the

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propane tanks for malfunctioning, defective and/or hazardous conditions, including missing and/or damaged O-ring, prior to delivery.

24. As a direct and proximate result of one or more of the aforesaid careless and negligent acts and/or omissions of the Defendant, AMERIGAS EAGLE HOLDINGS, INC., the Plaintiff, RICO KHAN, then and there sustained severe and permanent bodily injury and was, and will be, hindered and prevented from attending to his usual duties and affairs of life, and has lost, and will continue to lose, the value of that time as aforementioned. Further, Plaintiff, RICO KHAN, suffered great pain and anguish, both in mind and body, and will in the future continue to suffer. The Plaintiff, RICO KHAN, further expended and became liable for large sums of money for medical care and services and will in the future expend money for medical care and services endeavoring to become healed and cured of said injuries.

WHEREFORE, the Plaintiff, RICO KHAN, demands judgment against the Defendant, AMERIGAS EAGLE HOLDINGS, INC., in a sum greater than \$50,000.00 (Fifty Thousand Dollars) plus costs of this case and any additional relief this Court deems fair and just.

COUNT III – RICO KHAN v. AMERIGAS PROPANE PARTS & SERVICE, INC.

25. Plaintiff realleges and incorporates paragraphs 1-18 as though fully restated herein.
26. At the time and place aforesaid, Defendant, AMERIGAS PROPANE PARTS & SERVICE, INC., by and through its agents and/or employees, then and there breached the aforementioned duty through one or more of the following acts and/or omissions:
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knowing of the danger it posed to those handling the tanks;

- b. Carelessly and negligently delivered a malfunctioning, defective and/or hazardous propane tank despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- c. Carelessly and negligently, maintained a malfunctioning, defective and/or hazardous propane tank despite knowing, or through reasonable inquiry knowing, of the danger it posed to those handling the tanks;
- d. Carelessly and negligently, manufactured a propane tank that had a missing and/or damaged O-ring despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- e. Carelessly and negligently, delivered a propane tank that had a missing and/or damaged O-ring despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- f. Carelessly and negligently maintained a propane tank that had a missing and/or damaged O-ring despite knowing, or through reasonable inquiry, knowing of the danger it posed to those handling the tanks;
- g. Carelessly and negligently, failed to inspect its propane tanks for malfunctioning, defective and/or hazardous conditions, including a missing and/or damaged O-ring, prior to delivering the tank despite knowing, or through reasonable inquiry, knowing of the danger it posed those handling the tanks;
- h. Carelessly and negligently, failed to routinely inspect the propane tanks it delivered to its customers, including Power Solutions International, Inc., for

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malfunctioning, defective and/or hazardous conditions, including a missing and/or damaged O-ring, despite knowing, or through reasonable inquiry, knowing of the danger it posed those handling the tanks;

- i. Carelessly and negligently failed to train its employees in inspecting propane tanks for malfunctioning, defective and/or hazardous conditions, including missing and/or damaged O-rings, prior to delivery; and
- j. Carelessly and negligently failed to train its employees to routinely inspect the

propane tanks for malfunctioning, defective and/or hazardous conditions, including missing and/or damaged O-ring, prior to delivery.

27. As a direct and proximate result of one or more of the aforesaid careless and negligent acts and/or omissions of the Defendant, AMERIGAS PROPANE PARTS & SERVICE, INC., the Plaintiff, RICO KHAN, then and there sustained severe and permanent bodily injury and was, and will be, hindered and prevented from attending to his usual duties and affairs of life, and has lost, and will continue to lose, the value of that time as aforementioned. Further, Plaintiff, RICO KHAN, suffered great pain and anguish, both in mind and body, and will in the future continue to suffer. The Plaintiff, RICO KHAN, further expended and became liable for large sums of money for medical care and services and will in the future expend money for medical care and services endeavoring to become healed and cured of said injuries.

WHEREFORE, the Plaintiff, RICO KHAN, demands judgment against the Defendant, AMERIGAS PROPANE PARTS & SERVICE, INC., in a sum greater than \$50,000.00 (Fifty Thousand Dollars) plus costs of this case and any additional relief this Court deems fair and just.

Respectfully Submitted:

By: /s/ ALEXANDER GERTEIS
One of Plaintiff's Attorneys

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